

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-142 (DSD/KMM)

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) MARK ALLEN MILLER,
(2) CHRISTOPHER JAMES RAJKARAN,
and
(3) SAEID JABERIAN,
Also known as “Andre Jaberian,”

MOTION TO UNSEAL

Defendants.

The United States of America, by and through its attorneys, W. Anders Folk, Acting United States Attorney for the District of Minnesota, and Joseph H. Thompson and Miranda E. Dugi, Assistant United States Attorneys, hereby moves the Court for an order to unseal the case, including the Indictment, in the above-referenced matter.

This motion is based upon the records and proceedings in this matter. Specifically, on June 16, 2021, the government requested that the Indictment be sealed because defendants had not yet been arrested and the public filing of these materials could alert the defendants and result in their flight and destruction of evidence. Defendants located in the United States have now been apprehended. Otherwise, the government no longer has flight and destruction of evidence concerns, and thus unsealing is warranted.

Based on the above, the government respectfully requests that the Court issue an order to unseal the case, including the Indictment.

Dated: June 18, 2021

Respectfully Submitted,

W. ANDERS FOLK
Acting United States Attorney

BY: s/ Joseph H. Thompson
JOSEPH H. THOMPSON
MIRANDA E. DUGI
Assistant U.S. Attorneys